

Exhibit A

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA,)	
)	
v.)	Civil Action No. 12-760
)	
GEORGE POELCHER, JR.)	

**UNITED STATES' FIRST SET OF
INTERROGATORIES TO GEORGE POELCHER, JR.**

Pursuant to 28 U.S.C. § 3015 and Federal Rules of Civil Procedure 33 and 69, the United States of America propounds the following Interrogatories upon Defendant George Poelcher, Jr. The Interrogatories should be answered fully and **under oath** within 30 days from the date of service. You must serve your responses to the Interrogatories on the United States to: David Lew, Assistant U.S. Attorney, 700 Grant Street, Suite 4000, Pittsburgh, PA 15219.

For purpose of answering the Interrogatories, the following Instructions are provided:

INSTRUCTIONS

1. The singular form of a noun or pronoun shall be considered to include the plural form of the noun so used and vice versa. The masculine form of a noun or pronoun shall be considered to include the feminine and neuter gender of the noun or pronoun so used and vice versa.

2. "And" and "or" as used herein are terms of inclusion and not exclusion and shall be construed either disjunctively or conjunctively as necessary to bring within the scope of the Interrogatory any information or document that might otherwise be construed to be outside its scope.

3. Information requested in these Interrogatories includes information regarding any and all of your representatives, employees, agents, officials, or other persons in any way affiliated with you, **and any companies or businesses owned, operated, or controlled by you.**

INTERROGATORIES

1. Provide your full name, address, telephone number, social security number, and all other names by which you have been known.

2. List each address you have resided at during the past 10 years and the dates during which you resided at each address.

3. If you are presently or have ever been married, state the name of each spouse and the dates of each marriage.

4. State the name, age, relationship, and address of each person who you claim as a dependent.

5. For the past 10 years, provide the following employment information (including any periods of self-employment):

- a. The name, address, and telephone number of each employer
- b. Your wages, salary, and any other employment income
- c. Your job titles
- d. The dates you held each position

6. If you have an ownership interest in any real property, provide the address, date of purchase, purchase price, and the name and address of each person or business with an ownership interest in the property. If any such property is encumbered by a mortgage, Deed of Trust, security interest, or otherwise:

- a. Identify the property encumbered

- b. State the nature, amount, and present balance of such encumbrance
- c. State the date the property was encumbered
- d. State the name and address of each person or entity who holds the encumbrance

7. Identify all vehicles owned by you, your spouse, your children, or anyone with whom you currently reside. This includes but is not limited to automobiles, trucks, boats, recreational vehicles, aircraft, and motorcycles. Include in your answer the make, model, and year of each vehicle, the purchase price of each vehicle, and the outstanding loan balance on each vehicle.

8. For every business in which you have had any ownership or other interest at any time during the past 10 years, provide:

- a. The name and address of the principal place of business or general office, and the form of business organization (i.e., corporation, partnership, sole proprietorship, etc.)
- b. All partners, officers, and major shareholders
- c. The nature and present value of your interest in the business
- d. The name and address of each bank or other financial institution at which the business maintains any type of account, along with the account number associated with each account and current account balances
- e. For each outstanding loan, provide the name and address of the lender, the loan amount, and the current loan balance
- f. All real property owned by the business
- g. All vehicles owned by the business

- h. All assets of the business valued at greater than \$1000; include a description of any encumbrances on such property
- i. All investments held by the business, including but not limited to stocks, bonds, and mutual funds

9. For the past 10 years, identify all accounts that you have maintained at any financial institution, including but not limited to checking accounts, savings accounts, investment accounts, brokerage accounts, and retirement accounts. For each account identified, state:

- a. The name and address of the financial institution holding the account
- b. The account number and name(s) under which the account is held and whether it is business, personal, or joint
- c. The balance of the account as of the date you answered these Interrogatories

10. If you own any interest in any mutual fund, real estate investment trust, or other pooled investment, provide the name and address of the fund, and the amount and nature of your interest.

11. If you own any stocks, bonds, or other securities of any class in any company, firm, or corporation, or other entity, whether foreign or domestic, identify each such stock, bond, or security, including the name of the entity issuing the security and the value of security.

12. State the name and address of each insurer with whom you have life insurance policies, the amount of each policy, the policy numbers, the names and addresses of the beneficiaries as to each policy, and the cash surrender value of each policy if applicable.

13. If you have access to a safe deposit box or other depository, state the location and list the contents.

14. For each lawsuit in which you have been involved during the past 10 years, state the names of the parties, docket number of the suit, and name of the court. Identify any judgments for or against you, including amounts due therein.

15. Identify any asset not otherwise identified in your Responses with a value greater than \$500.

16. Identify any other source of income during the past three years that you have not otherwise identified in your Responses.

17. List all transfers of real or personal property that you have made in the last six years, including the type of property, the name of the person or entity to whom the transfer was made, the date of transfer, and the reason for the transfer. You may omit transfers of less than \$1,000.

18. If you have borrowed in excess of \$1000 from any bank or other institution within the past three years, state the date and amount of each loan, name and address of each lending institution, purpose of the loan, and the loan number.

19. If you have received income from any real estate holdings within the past three years, provide the addresses of such holdings, the name of each tenant, and the lease terms.

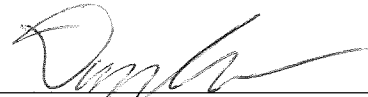
20. If you have any inheritance, life interest, or remainder interest, either vested or contingent, in any trust or estate, or if you are a beneficiary of any trust or estate, provide the name of the trust or estate, the present value of assets, the value of your interest, and the annual income received from each source.

21. Identify each person holding money or other property of any kind on your behalf or for you.

22. If you have any credit cards, identify the type of account or card, name and address of the issuer, credit limit, amount owed, and minimum monthly payment.

Respectfully submitted,

SCOTT W. BRADY
United States Attorney

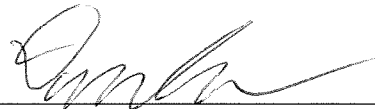


DAVID LEW
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PA ID No. 320338

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the United States' First Set of Interrogatories to George Poelcher, Jr. was served upon the following by first-class postage prepaid mail or electronic means on this 23rd day of May, 2019.

Stephen S. Stallings, Esq.
310 Grant Street, Suite 3600
Pittsburgh, PA 15219

A handwritten signature in black ink, appearing to read "David Lew", is written over a horizontal line.

DAVID LEW
Assistant United States Attorney

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA,)	
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**UNITED STATES' FIRST REQUESTS FOR
PRODUCTION OF DOCUMENTS TO GEORGE POELCHER, JR.**

Pursuant to 28 U.S.C. § 3015 and Federal Rules of Civil Procedure 34 and 69, the United States of America propounds the following Requests for Production of Documents upon Defendant George Poelcher, Jr. The United States requests that they produce all responsive documents within 30 days of service. Production shall take place at the office of the United States Attorney for the Western District of Pennsylvania, 700 Grant Street, Suite 4000, Pittsburgh, PA 15219.

For purpose of responding the Requests, the following Definitions and Instructions are provided:

DEFINITIONS

1. The term "tax returns" means tax form or forms used to file income taxes, including all schedules, supplements, and attachments.
2. The term "Internal Revenue Service" includes any officer, agent, representative, or employee of the Internal Revenue Service.
3. "You" or "your" means George Poelcher, Jr. as well as any companies or businesses owned, operated, or controlled by you.
4. "Person" means any natural person, corporation, partnership, proprietorship, trust, association, group of natural persons, or other entity of any nature whatsoever.

5. “Document” means any written, recorded, or graphic material of any kind whether prepared by you or by any other person that is in your possession, custody, or control. The term “document” includes, but is not limited to: contracts; letters; emails; telegrams; memoranda; notes; reports; studies; books; records; telephone books or messages; visitor books; calendar or diary entries; drafts; business cards; minutes of meetings, conferences, and telephone or other conversations or communications; ledgers; financial statements; photostats; microfilm; microfiche; audio, video, or other magnetically encoded recordings; and computer print-outs. The term also includes electronically stored information.

6. “Relate to” means to make a statement about, refer to, discuss, describe, reflect, contain, constitute, identify, or in any way pertain to, in whole or in part.

INSTRUCTIONS

1. The singular form of a noun or pronoun shall be considered to include the plural form of the noun so used and vice versa. The masculine form of a noun or pronoun shall be considered to include the feminine and neuter gender of the noun or pronoun so used and vice versa.

2. “And” and “or” as used herein are terms of inclusion and not exclusion and shall be construed either disjunctively or conjunctively as necessary to bring within the scope of the document request any information or document that might otherwise be construed to be outside its scope.

3. If you refuse to produce any requested document pursuant to a claim of privilege, please submit a certified sworn statement setting forth as to each such document: (a) the date and subject matter of the document; (b) the names and business positions of its authors and addressees; (c) all persons to whom copies of the document were directed or to whom its

contents were disclosed in whole or part; (d) all persons whose signatures, initials, or other notations appear on the document; and (e) the basis of the privilege claimed.

4. If you maintain that any document or record requested or that is related to the subject matter of a Request has been destroyed, set forth the content of said document, the location of any copies of said document, the date of such destruction, and the name of the person who ordered or authorized such destruction.

5. Unless otherwise specified, these Requests include any and all representatives, employees, agents, officials, or other persons in any way affiliated with you, as well as any business owned, operated, or controlled by you.

REQUESTS

1. 3 years of most recent tax returns, including copies of source documents (W2s, dividend reports, 1099s, charitable contribution documentation, profit and loss statements, schedules and attachments, etc.). If the tax returns for the most recent completed tax year have not been prepared or are not yet due, include copies of the source documents from which the returns will be prepared.

2. 6 most current monthly statements for all accounts (mortgage, car loan, credit card, bank, investment account, retirement accounts, IRAs, 529 accounts, pension, annuity, certificates of deposit, etc.).

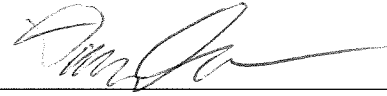
3. Most recent annual statement for any account (investment, retirement, pension, annuity, etc.).

4. Copies of any child support orders currently in effect.

5. Copies of any alimony support orders currently in effect (whether defendant is the payor or beneficiary).

Respectfully submitted,

SCOTT W. BRADY
United States Attorney

A handwritten signature in black ink, appearing to read 'David Lew', is positioned above a horizontal line.

DAVID LEW
Assistant U.S. Attorney
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Pittsburgh, PA 15219
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david.lew@usdoj.gov
PA ID No. 320338

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the United States' First Requests for Production of Documents to George Poelcher, Jr. were served upon the following by first-class postage prepaid mail or electronic means on this 23rd day of May, 2019.

Stephen S. Stallings, Esq.
310 Grant Street, Suite 3600
Pittsburgh, PA 15219

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DAVID LEW
Assistant United States Attorney